

[Submitting Counsel on Signature Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

**IN RE: UBER TECHNOLOGIES, INC.,
 PASSENGER SEXUAL ASSAULT
 LITIGATION**

No. 3:23-md-03084-CRB

**STIPULATION AND ~~PROPOSED~~
 ORDER REGARDING
 CERTAIN FACT SHEET DEADLINES**

This Document Relates to:

Judge: Hon. Charles R. Breyer
 Courtroom: 6, 17th Floor

ALL ACTIONS

WHEREAS, on March 19, 2024, the Court entered Pretrial Order No. 10 that stated the ride receipt or information deadline is to be “within 14 days of filing, transfer, or removal to this Court for all cases filed, transferred, or removed after February 1, 2024.” Mar. 19, 2024 Pretrial Order No. 10: Fact Sheet Implementation Order, Dkt. 348. The Court also set the PFS and DFS deadlines for cases filed after March 26, 2024 as follows: “[E]ach Plaintiff must complete and submit a PFS and execute applicable Authorizations within 30 days of the case being filed in, removed to, or transferred to MDL 3084. The Uber Defendants must complete and submit a DFS and produce Responsive Documents, within 30 days after a given plaintiff serves the ride receipt or ride information form” *Id.*

WHEREAS, on June 26, 2024, the Court entered an order that set a filing cutoff date of 60 days from the order’s date for JCCP cases affected by the Court of Appeal’s JCCP forum non con-

1 veniens opinion (Court's filing cutoff date). *See* June 26, 2024 Order Setting Filing Cutoff Date,
2 Dkt. 669.

3 **WHEREAS**, on July 17, 2024, the JCCP Plaintiffs requested to extend the Court's filing
4 cutoff date to 60 days after the Supreme Court grants or denies the petition for review. *See* July 17,
5 2024 California JCCP Plaintiffs' Motion to Extend the Court's Order Setting Filing Cutoff Date,
6 Dkt. 700.

7 **WHEREAS**, on July 22, 2024, the Court denied the JCCP Plaintiffs' request. *See* July 22,
8 2024, Order Denying California JCCP Plaintiffs' Motion to Extend Filing Cutoff Date, Dkt. 709.

9 **WHEREAS**, anticipating approximately 500 cases affected by the Court of Appeal's JCCP
10 forum non conveniens opinion (the recent WHB cases), on August 14, 2024, Williams Hart &
11 Boundas, LLP (WHB) reached out to both MDL Co-Lead Counsel and counsel for Defendants Uber
12 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, the parties) to discuss, among
13 other things, the extension of the PFS and DFS deadlines applicable to the recent WHB cases. An
14 extension would provide for more time to submit accurate fact sheets and a uniform deadline for
15 their submission.

16 **WHEREAS**, the parties agreed the PFSs for the recent WHB cases would be due on No-
17 vember 1, 2024, the DFSs for the recent WHB cases would be due on January 17, 2025, and these
18 deadlines may be subject to revision based on further discussion and agreement amongst the parties
19 (or, in the absence of agreement, via application to the Court) about why changed circumstances
20 (e.g., a significant additional volume of filings of cases by other law firms) may warrant further ad-
21 justment to the deadlines. Nothing about this stipulation changes any obligations of the parties with
22 respect to requirements set out in prior orders as to inclusion of the applicable authoriza-
23 tions/responsive documents.

24 **THEREFORE**, the parties respectfully request the Court enter the parties' stipulation estab-
25 lishing PFSs for the recent WHB cases are due on November 1, 2024, DFSs for the recent WHB
26 cases are due on January 17, 2025, and these deadlines may be subject to further revision as de-
27 scribed in the preceding WHEREAS clause.
28

1 **IT IS SO STIPULATED.**

2 Respectfully submitted,

3 Dated: August 19, 2024

By: /s/ Brian Abramson
John Eddie Williams, Jr. (*Pro Hac Vice*)
Brian Abramson (*Pro Hac Vice*)
Margret Lecocke (*Pro Hac Vice*)
Walt Cubberly (SBN 325163)
Batami Baskin (*Pro Hac Vice*)
Myles Shaw (*Pro Hac Vice*)
WILLIAMS HART & BOUNDAS, LLP
8441 Gulf Freeway, Suite 600
Houston, TX 77017
Tel: (713) 230-2200
Fax: (713) 643-6226
jwilliams@whlaw.com
babramson@whlaw.com
mlecocke@whlaw.com
wcubberly@whlaw.com
bbaskin@whlaw.com
mshaw@whlaw.com

14 *Counsel for WHB Plaintiffs*

15 Dated: August 19, 2024

By: /s/ Sarah London
Sarah R. London (SBN 267083)
**LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP**
275 Battery Street, 29th Floor
San Francisco, CA 94111
Tel: (415) 956-1000
Fax: (415) 956-1008
slondon@lchb.com

By: /s/ Rachel Abrams
Rachel B. Abrams (SBN 209316)
**PEIFFER WOLF CARR KANE
CONWAY & WISE, LLP**
555 Montgomery Street, Suite 820
San Francisco, CA 94111
Tel: (415) 426-5641
Fax: (415) 840-9435
rabrams@peifferwolf.com

By: /s/ Roopal Luhana
Roopal P. Luhana (*Pro Hac Vice*)
CHAFFIN LUHANA LLP

600 Third Avenue, 12th Floor
New York, NY 10016
Tel: (888) 480-1123
Fax: (888) 499-1123
luhana@chaffinluhana.com

Co-Lead Counsel for Plaintiffs

Dated: August 19, 2024

By: /s/ Kyle Smith
Kyle N. Smith (*Pro Hac Vice*)
Jessica E. Phillips (*Pro Hac Vice*)
**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
2001 K Street, NW
Washington, DC 20006
Telephone: (202) 223-7300
Facsimile: (202) 223-7420
ksmith@paulweiss.com
jphillips@paulweiss.com

Randall S. Luskey (SBN 240915)
**PAUL, WEISS, RIFKIND, WHARTON
GARRISON LLP**
535 Mission Street, 24th Floor
San Francisco, CA 94105
Tel: (628) 432-5100
Fax: (628) 232-3101
rluskey@paulweiss.com

Robert Atkins (*Pro Hac Vice*)
Jacqueline P. Rubin (*Pro Hac Vice*)
Caitlin E. Grusauskas (*Pro Hac Vice*)
Andrea M. Keller (*Pro Hac Vice*)
**PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP**
1285 Avenue of the Americas
New York, NY 10019
Tel: (212) 373-3000
Fax: (212) 757-3990
ratkins@paulweiss.com
jrubin@paulweiss.com
cgrusauskas@paulweiss.com
akeller@paulweiss.com

Michael B. Shortnacy (SBN 277035)
SHOOK, HARDY & BACON, L.L.P.
2049 Century Park East, Suite 3000

Los Angeles, CA 90067
Tele: (424) 285-8330
Fax: (424) 204-9093
mshortnacy@shb.com

Patrick Oot (*Pro Hac Vice*)
SHOOK, HARDY & BACON, L.L.P.
1800 K St. NW, Suite 1000
Washington, DC 20006
Tel: (202) 783-8400
Fax: (202) 783-4211
oot@shb.com

*Counsel for Defendants Uber Technologies, Inc.,
Rasier, LLC, and Rasier-CA, LLC*

FILER'S ATTESTATION

I, Brian Abramson, am the ECF User whose ID and password are being used to file this document. In compliance with Civil Local Rule 5-1(i)(3), I hereby attest that each of the signatories identified above has concurred in this filing.

Dated: August 19, 2024

By: /s/ Brian Abramson
Brian Abramson

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The Court hereby GRANTS the parties' stipulation as follows: the PFSs for WHB cases filed on or after July 27, 2024 in connection with the Court of Appeal's JCCP forum non conveniens opinion (the recent WHB cases) are due on November 1, 2024, the DFSs for the recent WHB cases are due on January 17, 2025, and these deadlines may be subject to revision as described in the final WHEREAS clause of the parties' stipulation.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: August 22, 2024


HON. CHARLES R. BREYER
UNITED STATES DISTRICT JUDGE